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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FITNESS INTERNATIONAL, LLC

Plaintiff,

-vs-

LEAH ALSPAUGH and DOES 1
through 50, inclusive,

Defendant.

Case No.: 8:22-CV-01800-DOC-DFM

**FITNESS INTERNATIONAL, LLC’S
FURTHER BRIEF RE: LEAH
ALSPAUGH’S CONTINUING
VIOLATION OF THE COURT’S
PERMANENT INJUNCTION**

Plaintiff FITNESS INTERNATIONAL, LLC (hereinafter “Fitness”) respectfully submits the following further supplemental brief regarding defendant LEAH ALSPAUGH’s (hereinafter “Alspaugh”) continuing violation of the Permanent Injunction entered by this Court on May 8, 2023. [Dkt. 81.]

1 **A. Alspaugh’s Attempt To Change Locks At Fitness Facility**

2 Alspaugh was released from custody for her prior violations of the Court’s
3 Permanent Injunction (including an assault on one of Fitness’ employees) on March 22,
4 2024, with the understanding that Alspaugh would obtain treatment through Telecare or
5 another mental health agency. Approximately two (2) weeks after being released,
6 Alspaugh returned to her conduct of harassing Fitness and its personnel.

7 At approximately 3:45 p.m. on April 9, 2024, Alspaugh showed up at an LA
8 Fitness club in Santa Fe Springs, California. As detailed in the Incident Report that was
9 sent to Fitness from Brixmor Property Group – Gateway Plaza, the property management
10 company for the plaza where the Santa Fe Springs LA Fitness club was located, the club
11 was closed at the time, and one of the security guards from the plaza in which the club
12 was located noticed Alspaugh hanging around outside of the club. The security guard
13 asked what she was doing there, and she stated that she was the owner and was waiting
14 for a lock smith to come to change the locks. A lock smith showed up at shortly after
15 5:00 p.m., at which point the security guard contacted the property manager, who in turn
16 contacted Fitness who informed him of the situation with Alspaugh, that she did not have
17 authority to change the locks, and that Fitness has both a federal permanent injunction
18 and a state court restraining order that prohibit Alspaugh from trespassing onto Fitness’
19 premises. The lock smith left, and the police were called, however Alspaugh left before
20 the police arrived. [Stokesberry Decl. at ¶2, and Exhibits 1, 2, and 3 thereto.]

21 **B. Alspaugh’s Continued Harassing Emails To Fitness Personnel**

22 On April 10, 2024, Alspaugh sent two emails to Fitness’ Human Resources
23 Department. The first email was sent at 11:39 a.m., and states: “Please submit a check
24 in the amount of 5400. To Leah alspaugh for unpaid wages claim to her home at 241
25 trails end road, Chelsea,al 35043.” [Stokesberry Decl., at ¶3, and Exhibit 4 thereto (typos
26 in original).]

27 Alspaugh sent a second email at 1:12 p.m. on April 10, 2024, which consisted
28 solely of a photograph of a page from what appears to be a religious pamphlet, with the

1 sentence “Whoever finds his own life will lose it, but the person who loses his life for
 2 my sake will find it” circled with an asterisk next to it. Below that is a handwritten
 3 notation that states “HATE CRIME FOR WAR! LEAD ON.” [Stokesberry Decl., at ¶3,
 4 and Exhibit 5 thereto.]


5 On April 24, 2024, Alspaugh sent two emails to Fitness’ Vice President of Human
 6 Resources, Mindy Stokesberry, at 6:44 p.m. and 6:45 p.m. The emails both had the
 7 subject line “Miracle Mile Rainbow.” The first email includes a photograph of the sky;
 8 the second contains a photograph of an unidentified man. [Stokesberry Decl., at ¶4, and
 9 Exhibit 6 thereto.] Research indicates that the unidentified man in Alspaugh’s email is
 10 Satoru Komiya, President and CEO of Tokio Marine Holdings. See
 11 <https://www.tokiomarinehd.com/en/company/officers/s-komiya.html>.

12 On April 29, 2024, Alspaugh sent Ms. Stokesberry an additional email which
 13 states in pertinent part: “Hey Mindy, FYI another tawainese lady from the city of walnut
 14 with the last name Chen probably Alice Chen Lin king sister got charged with 150
 15 million dollar embezzlement of fraudulent stamps and post marks to ship to China.”
 16 [Stokesberry Decl., at ¶5, and Exhibit 7 thereto (types in original).]

17 As per usual, all of the emails were sent from the proreults411@gmail.com
 18 email address, which infringes on Fitness’ federally protected trademark, Pro Results.

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 20 DATED: April 30, 2024

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 22 BY: _____

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